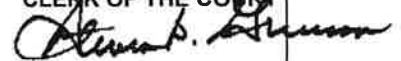


# **EXHIBIT G**

# **EXHIBIT G**

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1 **MWCN**  
2 **MILAN'S LEGAL**  
3 MILAN CHATTERJEE, ESQ.  
4 NEVADA BAR NO. 15159  
5 3172 N. Rainbow Blvd., #1406  
6 Las Vegas, Nevada 89108  
7 (702) 381-2875  
8 Milan@MilansLegal.com  
9 Attorney for Plaintiff

6 **DISTRICT COURT**

7  
8 **CLARK COUNTY, NEVADA**

9 PARNELL COLVIN, an individual,

10 Plaintiff,

11 vs.

12 TAKO, LLC, a domestic limited-liability  
13 company,

14 Defendant.

Case No.: A-20-820973-C

Dept.: VIII

**MOTION TO WITHDRAW AS COUNSEL**

**HEARING REQUESTED**

**\*SIMULTANEOUS AUDIOVISUAL  
TRANSMISSION EQUIPMENT  
APPEARANCE NOTICE\***

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18 COMES NOW, Plaintiff's attorney of record herein, MILAN CHATTERJEE, ESQ. of  
19 MILAN'S LEGAL, and hereby move this Honorable Court for an order permitting withdrawal as  
20 counsel of record for Plaintiff, PARNELL COLVIN, pursuant to EDCR 7.40(b)(2)(i).

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1 The reasons in support of this Motion are more fully set forth in the below Points and  
2 Authorities, as well as the attached declaration of Milan Chatterjee, Esq., each of which is made part  
3 hereof by reference.

4 DATED this 9<sup>th</sup> day of February, 2023.

5 **MILAN CHATTERJEE, ESQ.**

6  
7 By: /s/ Milan Chatterjee, Esq.

8 **MILAN'S LEGAL**  
9 **MILAN CHATTERJEE, ESQ.**  
10 **NEVADA BAR NO. 15159**  
11 **3172 N. Rainbow Blvd, # 1406**  
12 **Las Vegas, Nevada 89108**  
13 **(702) 381-2875**  
14 **Milan@MilansLegal.com**  
15 **Attorney for Plaintiff**  
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**MEMORANDUM OF POINTS AND AUTHORITIES**

Milan Chatterjee, Esq. of Milan's Legal ("Moving Counsel") is the attorney for Plaintiff PARNELL COLVIN ("Plaintiff") in the present matter. Moving Counsel is the third attorney to seek a Motion to Withdraw as Counsel in this matter, after Matthew W. Hoffmann, Esq. and Garrett T. Ogata, Esq.

Moving Counsel has recently been made aware of a number of material misrepresentations made to him by Plaintiff during his representation. Some of these material misrepresentations were brought to Moving Counsel's attention by Defense Counsel in Court Filing #52 titled "Tako, LLC's Opposition to Plaintiff's Motion to Amend Complaint," which was filed with this Court on January 9, 2023.

Moreover, Moving Counsel was recently made aware of material misrepresentations made to him by Plaintiff, which have been directly contradicted by Plaintiff's own court filings in a case with the U.S. District Court for the District of Nevada and a judicial opinion by a federal judge.

Moving Counsel believes that Plaintiff has legitimate claims in this matter. Nonetheless, with the material misrepresentations made to Moving Counsel by Plaintiff, Moving Counsel finds that Plaintiff wishes to pursue an approach in this present matter which Moving Counsel finds to be repugnant and imprudent. Furthermore, Moving Counsel recognizes that he has a Duty of Candor to the Tribunal pursuant to Nevada Rules of Professional Conduct 3.3. Moving Counsel does not want to violate this ethical duty due to Plaintiff's material misrepresentations. Consequently, Moving Counsel seeks to withdraw from his representation of Plaintiff.

SCR 46 provides in pertinent part:

The attorney in an action or special proceeding may be changed at any time before judgment of final determination as follows:

- (1) Upon consent of the attorney, approved by the client.
- (2) Upon the order of the court or judge thereof on the application of the attorney or client.

Additionally, Nevada Supreme Court Rule 166 states in relevant part:  
Rule 166. Declining or Terminating Representation.

- (1) Except as stated in subsection 3, a lawyer shall not represent a client or, where representation has commenced, shall withdraw from the representation of a client if:

(a) The representation will result in violation of the rules of professional conduct or other law;

(b) The lawyer's physical or mental condition materially impairs the lawyer's ability to represent the client; or

(c) The lawyer is discharged.

(2) Except as stated in subsection 3, a lawyer may withdraw from representing a client if withdrawal can be accomplished without material adverse effect on the interests of the client, or if:

(a) The client persists in a course of action that the lawyer reasonably believes is criminal or fraudulent;

(b) The client has used the lawyer's services to perpetrate a crime or fraud;

(c) A client insists upon pursuing an objective that the lawyer considers repugnant or imprudent;

(d) The client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled;

(e) The representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client; or

(f) Other good cause for withdrawal exists.

In the instant matter, Moving Counsel has recently been made aware of a number of material misrepresentations made to him by Plaintiff during his representation. Some of these material misrepresentations were brought to Moving Counsel's attention by Defense Counsel in Court Filing #52 titled "Tako, LLC's Opposition to Plaintiff's Motion to Amend Complaint," which was filed with this Court on January 9, 2023.

Moreover, Moving Counsel was recently made aware of material misrepresentations made to him by Plaintiff, which have been directly contradicted by Plaintiff's own court filings in a case with the U.S. District Court for the District of Nevada and a judicial opinion by a federal judge.

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1 Moving Counsel finds that Plaintiff wishes to pursue an approach in this present matter which  
2 Moving Counsel finds to be repugnant and imprudent. Furthermore, Moving Counsel recognizes  
3 that he has a Duty of Candor to the Tribunal pursuant to Nevada Rules of Professional Conduct 3.3.  
4 Moving Counsel does not want to violate this ethical duty due to Plaintiff's material  
5 misrepresentations. Consequently, Moving Counsel does not believe that he can provide effective  
6 representation and moves to withdraw as counsel.

7 **CONCLUSION**

8 Moving counsel believes good cause exists for withdrawal in this matter.

9 DATED this 9th day of February, 2023.

10 **MILAN CHATTERJEE, ESQ.**

11  
12  
13 By: /s/ Milan Chatterjee, Esq.

14 **MILAN'S LEGAL**  
15 MILAN CHATTERJEE, ESQ.  
16 NEVADA BAR NO. 15159  
17 3172 N. Rainbow Blvd, # 1406  
18 Las Vegas, Nevada 89108  
19 (702) 381-2875  
20 Milan@MilansLegal.com  
21 Attorney for Plaintiff  
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**DECLARATION OF MILAN CHATTERJEE, ESQ.**

I, Milan Chatterjee, Esq., do hereby declare under penalty of perjury that the assertions of this Declaration are true and correct to the best of my knowledge. As for those assertions based on belief, I believe them to be true.

1. That I am the attorney of record for Mr. Parnell Colvin in the above-referenced matter;

2. That I am filing this Declaration in support of my Motion to Withdraw;

3. That I am withdrawing my representation of Mr. Colvin due to multiple material misrepresentations that he has made to me during my representation of him;

4. That to stay true to my Duty of Candor to this tribunal pursuant to the Nevada Rules of Professional Conduct 3.3, I am unable to continue my representation of Mr. Colvin;

5. That I am unable to continue representing Mr. Colvin, as I find his approach in the present matter to be repugnant and imprudent;

6. That I have submitted my Notice of Attorney Withdrawal letter to Mr. Colvin on February 8, 2023 via email to the email address pc681@yahoo.com, and Mr. Colvin has acknowledged receipt of this letter;

7. That I have submitted all case-related documents in my possession to Mr. Colvin through USPS Priority Mail on February 9, 2023 to 6681 Tara Avenue, Las Vegas, NV 89146 (Tracking Number: 9505-5265-4886-3040-5099-63) and/or through email on February 9, 2023 to the email address pc681@yahoo.com.

8. That I have made multiple requests to Mr. Colvin, asking for his latest, good mailing address to mail the case-related documents to. Mr. Colvin refused to give me his latest, good mailing address, and insisted for me to mail the case-related documents to 6681 Tara Avenue, Las Vegas, NV 89146 which (per Mr. Colvin) would be automatically forwarded to Mr. Colvin's latest, good mailing address.

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DATED this 9<sup>th</sup> Day of February, 2023.

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